



June 7, 2022

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VIA ECF

Hon. Nitza I. Quiñones Alejandro
United States District Judge
Eastern District of Pennsylvania
601 Market Street
Courtroom 8-B
Philadelphia, PA 19106

Re: Zurich American Ins. Co. v. L-M Service Company Inc., et al.
EDPA Civil Action No.: 2:21-cv-04148-NIQA
Our File No.: 463850

Dear Judge Quiñones Alejandro:

Pursuant to the Court's Scheduling Order of December 17, 2021, the parties jointly and respectfully request that this case be referred to Magistrate Judge Lynne A. Sitariski for a Settlement Conference. By way of status report, plaintiff has served expert disclosures and defendants will be serving expert disclosures on or before June 30, 2022. Expert depositions must be completed by August 31, 2022. Therefore, the parties respectfully request that the Settlement Conference be scheduled between June 30, 2022 and August 31, 2022, or that the deadline for completing expert depositions be extended to allow the parties to attend a settlement conference before incurring expert deposition-related costs.

Thank you for your consideration. I am happy to schedule a telephone conference call with all counsel and the Court, if needed.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "Sean P. O'Donnell", with a stylized flourish at the end.

SEAN P. O'DONNELL

cc: Chambers_of_Judge_Quinones@paed.uscourts.gov
All Counsel of Record (via ECF)